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10 | Counsel for Robins Cloud LLP

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16 and) Chapter 11
17)
18 PACIFIC GAS AND ELECTRIC) (Lead Case—Jointly Administered)
COMPANY)
19 Debtors) **DECLARATION OF ROBERT**
) **PRYSON IN SUPPORT OF MOTION**

21 Affects: FOR ORDER AUTHORIZING
 WITHDRAWAL OF COUNSEL TO
 N.P. A MINOR CHILD

22 | Pacific Gas & Electric Company

Both Debtors

24 —)

25 * All papers shall be filed in the Lead Case, No. 19-30088 (DM).)
26)

Declaration of Robert Bryson

I, Robert Bryson, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the “Firm”), attorneys of
5 record for N. P., a minor child (“Creditor”).¹ I am duly admitted to practice law before all courts
6 of the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true
9 and within the scope of my personal knowledge, and if called upon to do so I could and would
10 testify competently to these facts.

11 4. On January 29, 2019, Debtors filed voluntary petitions commencing their
12 bankruptcy cases.

13 5. On October 16, 2019, the Firm filed Proof of Claim No. 29803 on behalf of N. P.,
14 a minor child, (“Claim”), seeking damages from the North Bay Fires. Since the filing of the
15 Claims, an irreconcilable difference has developed between Creditor and the Firm. As a result,
16 the Firm notified Creditor that it must withdraw as counsel.

17 6. To the extent that Creditor requests that the Firm turn over any files or
18 information that she is entitled to, the Firm will cooperate and transmit such files.

19 7. The Firm will cause the Motion to be served on all of the addresses provided to
20 the Firm by Creditor, including the following:

2170 Road E
Redwood Valley, CA 95470

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 21, 2022.



Robert Bryson

²⁸ ¹ The Firm retained Grimshaw Law Group, P.C. (“GLG”) to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.

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